

October 16, 2023

By ECF

The Honorable Katherine Polk Failla
United States District Court
for the Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square, Room 618
New York, New York 10007

Re: *Dinosaur Financial Grp. LLC et al. v. S&P Global, Inc. et al.*, 22 Civ. 1860 (KPF)

Subject: Filing of Proposed Orders Pursuant to the Scheduling Order

Dear Judge Failla:

This joint letter is submitted by all parties.

Pursuant to paragraph 6 of the Court's Scheduling Order dated September 14, 2023 (Doc. No. 116), the parties have conferred and reached agreement as to three stipulations and proposed orders: (i) Stipulated Protective Order; (ii) Order Regarding Production of Electronically Stored Information and Paper Documents; and (iii) Stipulated Order Governing the Disclosure and Non-Disclosure of Certain Information Regarding Experts and Consultants.

The parties do not at this time anticipate proposing the entry of a separate Order under Federal Rule of Evidence 502(d), although they respectfully request the Court permit them to request such an Order at a later date should the need arise.

Respectfully Submitted,

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